

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Criminal Action No. 06-94-GMS
	:	
MELVIN MUNCE,	:	
	:	
Defendant.	:	

JOINT MOTION FOR WAIVER OF SPEEDY TRIAL

The Defendant, Melvin Munce, by and through his counsel, Eleni Kousoulis, Esquire, and the United States of America, by and through its attorney, Robert Kravetz, Assistant United States Attorney, hereby jointly move for waiver of speedy trial in this matter. In support of this joint motion, the parties submit the following:

1. The parties have reached a tentative plea agreement and a change of plea hearing is currently scheduled in this matter for February 8, 2007.
2. The parties jointly move to waive from the speedy trial calculation, the time period between January 22, 2007 and February 8, 2007. The parties assert that relief from the Speedy Trial Act is in the best interest of justice.

WHEREFORE, for these reasons and any other such reasons that shall appear to the Court, the parties respectfully request that the time period between January 22, 2007 and February 8, 2007 be excluded from the speedy trial calculation.

Respectfully Submitted,

/s/
Eleni Kousoulis, Esq.
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/s/
Robert Kravetz, Esq.
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Dated: January 16, 2007

IT IS SO ORDERED this _____ day of _____, 2007.

The Honorable Gregory M. Sleet
United States District Court